

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re: Methyl Tertiary Butyl Ether ("MTBE")  
Products Liability Litigation

**MDL No. 1358  
Master File C.A. No.  
1:00-1898 (SAS)**

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**This document relates to the following case:**

*Orange County Water District v. Unocal, et al.*,  
Case No. 04 Civ. 4968

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**DECLARATION OF DAVID BOLIN IN SUPPORT OF PLAINTIFF ORANGE COUNTY  
WATER DISTRICT'S OPPOSITION TO DEFENDANTS' MOTION FOR SUMMARY  
JUDGMENT DUE TO LACK OF INJURY AND DAMAGES AT  
CERTAIN TRIAL SITES**

I, David Bolin, declare:

1. I am a certified hydrogeologist currently employed by the Orange County Water District (the "District"). I have participated in this matter and am familiar with or have personal knowledge concerning the facts stated herein.

2. Unocal #5399 is part of the District's Bellwether Plume No. 1 and this plume is associated with the City of Newport Beach drinking water well NB-TAMD. Sampling data obtained from Friedman & Bruya shows that MTBE was detected in this well in 2005 and 2008. A copy of the District's Bellwether Plume List is attached as Exhibit 1.

3. Beacon Bay, Fountain Valley is part of the District's Bellwether Plume No. 3 and this plume is associated with District monitoring wells OCWD-M10, OCWD-M11, and OCWD-M45. Sampling by the District shows that MTBE was detected in OCWD-M45 in 2005.


4. Unocal #5123 and Thrifty #368 are both part of the District's Bellwether Plume No. 9 and this plume is associated with the City of Huntington Beach drinking water wells HB-1, HB-13, HB-4, and HB-7.

5. By 2003, MTBE had been detected in nine public water supply wells and a handful of other water supply wells.

6. In 2008 and 2010 the District conducted vulnerability assessments of the drinking water wells within its service area by contracting with Friedman & Bruya to analyze water samples for the presence of MTBE at levels of 0.02 ppb. As a result of the 2010 study, MTBE was detected for the first time in fifty-six public drinking water wells. It is my understanding that all of the sampling results obtained by Friedman & Bruya were produced in this matter.

7. The District has incurred substantial costs to conduct Cone Penetration Testing and groundwater sampling of stations associated with Bellwether Plume Nos. 1, 3, and 9, as well as non-station specific costs that I understand have been set forth in detail in the District's discovery responses.

I declare under the laws of the State of California that the foregoing is true. Executed this 19th day of July, 2014, at Fountain Valley, California.

  
David Bolin

# EXHIBIT 1

## Bellwether Stations List

Plume	Station	Address	City
1	Arco #1887	16742 Beach Boulevard	Huntington Beach, CA
1	Exxon #4283	8980 Warner Avenue	Fountain Valley, CA
1	G&M #4	16990 Beach Boulevard	Huntington Beach, CA
1	Mobil #18-G6B	9024 Warner Avenue	Fountain Valley, CA
1	Shell #204359403	8471 Warner Avenue	Huntington Beach, CA
1	Texaco #121681	9475 Warner Avenue	Fountain Valley, CA
1	Texaco #8520	8520 Warner Avenue	Fountain Valley, CA
1	Unocal #5376	8971 Warner Avenue	Huntington Beach, CA
1	Unocal #5399	9525 Warner Avenue	Fountain Valley, CA
2	Arco #6131	3201 Harbor Boulevard	Costa Mesa, CA
2	Mobil #18-HDR	3195 Harbor Boulevard	Costa Mesa, CA
2	Mobil #18-JMY	3470 Fairview road	Costa Mesa, CA
3	Arco #1905	18025 Magnolia Street	Fountain Valley, CA
3	Arco #1912	18480 Brookhurst Street	Fountain Valley, CA
3	Beacon Bay Carwash	10036 Ellis Avenue	Fountain Valley, CA
3	Thrifty #383	18520 Brookhurst Street	Fountain Valley, CA
8	Arco #3085	3361 S. Bristol Street	Santa Ana, CA
8	Beacon Bay Carwash	1501 W. MacArthur Boulevard	Santa Ana, CA
8	Chevron #1921	3801 S. Bristol Street	Santa Ana, CA
8	G&M #24	3301 Bristol Street	Santa Ana, CA
8	Mobil #18-HEP	2921 S. Bristol Street	Santa Ana, CA
9	Chevron #9-5401	5992 Westminster Boulevard	Westminster, CA
9	Huntington Beach Arco	6002 Bolsa Avenue	Huntington Beach, CA
9	Shell #6502	6502 Bolsa Avenue	Huntington Beach, CA
9	Thrifty #368	6311 Westminster Boulevard	Westminster, CA
9	Unocal #5123	14972 Springdale Street	Huntington Beach, CA
9	Unocal #5226	6322 Westminster Boulevard	Westminster, CA
9	USA Gasoline #141	14600 Edwards Street	Westminster, CA
9	Westminster Shell	5981 Westminster Avenue	Westminster, CA